

ATTACHMENT A

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

United States of America
Plaintiff

Case No. 2:20-CR-94

v.

Justin Sean Johnson
Defendant

Defendant's First Request for Production

The Defendant requests that the United States produce hard copies of the documents described below. Should you not respond to a request in full, you are requested to state the reasons you will not comply in full. If you have no responsive documents with regard to a request, you are asked to so state.

1. The PowerPoint presentation developed by the United States and shown to Defendant's former counsel, Nicola Henry-Taylor, during pre-trial discussions.
2. Transcripts, recordings and other records of the interviews the United States had with Defendant's co-workers, as well as other documents, records, or papers that allow the United States to say the Defendant was fired for improperly accessing hard drives.
3. Documents, records, and papers that show the Defendant's actions caused "widespread computer system shutdowns".
4. Documents, records, and papers that show the Defendant's actions caused "hospital employee absenteeism".
5. Documents, records, and other papers that show the Defendant intended to intimidate the victims in this matter.
6. Orders (pursuant to 18 U.S.C § 3292, or otherwise) and their respective applications and supporting exhibits and other accompanying material the Government purports suspended or tolled the statute of limitation applicable to the charge in Count 1 of the indictment in this case.
7. Documents, records, and other papers that show the Defendant acquired an application for a tax preparer ID number to be used by others to create fictitious tax returns. The focus of this request is on records that show the intent in use of the application, not that the application itself was acquired.
8. Metadata of the tax preparer ID application that shows the date it was created on Defendant's hard drive.
9. Documents, records, and other papers that evidence the filing of any fictitious tax returns, or other wrongdoing, in

connection with the tax preparer identification number issued to the Defendant.

10. Metadata relating to what the United States referred to as an "epitaph" (the same document referred to in PSR ¶ 30, according to the Government's response at ECF No. 70) that show the date the document was created and/or last modified.

By:

A handwritten signature in black ink, appearing to read "Justin S. Johnson", with a stylized flourish at the end.

Justin S. Johnson
Defendant
Reg. No. 58290-039
FCI Loretto Satellite Camp
P.O. Box 1000
Cresson, PA 16630